Buchanan

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July 25, 2025

Via ECF

The Honorable John G. Koeltl U.S. District Judge U.S. District Courthouse 500 Pearl Street New York, NY 10007-1312

So ordered.

Re:

Zip Co US, Inc. v. Peter Maher, Ovanti Ltd, and Ovanti US, Inc.

U.S. District Court, SDNY; Docket No. 25-cv-06024

Letter Motion to Adjourn July 25, 2025 Show Cause Hearing

Dear Judge Koeltl:

We represent the Plaintiff, Zip Co US, Inc. ("Zip"), in the above-referenced matter. On July 22, 2025, Zip filed a Verified Complaint (ECF 1) along with an Emergency Motion for Temporary Restraining Order and Preliminary Injunction (ECF 2).

In connection with the Temporary Restraining Order, Zip has sought a court order directing Individual Defendant Peter Maher to immediately return his company-owned laptop, which contains Zip's Confidential Information. A hearing on the TRO request is scheduled for today at 5:00 PM EST.

We understand that the Defendants have retained the law firm Glenn Agre Bergman & Fuentes to represent their interests in this matter. Earlier today, at 11:51 AM EST, counsel for the Defendants indicated that Mr. Maher has shipped the company-owned laptop to Zip, via UPS Ground, with Package Tracking Number 1Z0E0G800326963224. However, as of this moment, UPS has not yet delivered the aforementioned package to Zip.

Given these circumstances and the apparent delivery of the laptop still pending, we respectfully request a brief adjournment of today's TRO hearing to allow for the arrival of the package. Thank you for your consideration of this request.

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Respectfully submitted,

George C. Morrison, Esquire

GCM/cbf

cc: Reid Skibell, Esquire (via email: <u>rskibell@glennagre.com</u>)
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